

Privacy Notice

Index

<u>1.</u>	<u>Introduction</u>	<u>3</u>
<u>2.</u>	<u>How we collect your data</u>	<u>3</u>
<u>3.</u>	<u>Categories of data we collect</u>	<u>3</u>
<u>4.</u>	<u>How we use your data</u>	<u>4</u>
<u>5.</u>	<u>Sharing of your data</u>	<u>6</u>
<u>6.</u>	<u>Data submission to the Higher Education Statistics Agency (HESA)</u>	<u>7</u>
<u>7.</u>	<u>How we keep your data secure</u>	<u>7</u>
<u>8.</u>	<u>Engagement monitoring</u>	<u>7</u>
<u>9.</u>	<u>How long we keep your information</u>	<u>7</u>
<u>10.</u>	<u>Your rights</u>	<u>8</u>
<u>11.</u>	<u>Further information</u>	<u>8</u>

Document Version Control

Document Version	Committee	Committee Action	Date
7.0	SMT	Recommended approval	5 July 2023
	Board of Directors	Approved	21 July 2023
		Date in force	1 August 2023
8.0	SMT	Recommended approval	6 March 2024
	Board of Directors	Approved	18 March 2024
		Date in force	19 March 2024
9.0		Reviewed by A Jeram (Next review in the next Academic Year.)	26 February 2025
		Date in force	27 February 2025

The Privacy Notice will be reviewed annually by the Document Lead. Any significant changes beyond the scope of an annual review will require the approval of the Board of Directors acting on recommendation from the Senior Management Team (SMT).

1. Introduction

This Privacy Notice concerns the processing of personal data of former, current, present and prospective students of Bloomsbury Institute ("you", "your"). The Privacy Notice explains how Bloomsbury Institute ("Bloomsbury Institute", "we", "our", "us") collects, uses and shares your personal data, and your rights in relation to the personal data we hold on you.

Personal data only includes information relating to natural persons who:

- can be identified or who are identifiable, directly from the information in question; or
- who can be indirectly identified from that information in combination with other information.

Our degrees are validated and awarded by the University of Northampton and Wrexham University, therefore for the purposes of processing for activities such as admissions, academic performance, decisions regarding progression and awards, relevant data is shared with the University of Northampton and Wrexham University. Further details of the use of data are highlighted in Section 4 of this document.

Bloomsbury Institute is the Data Controller of your personal data and is subject to the United Kingdom -General Data Protection Regulation (the "UK GDPR") and Data Protection Act 2018.

Bloomsbury Institute is registered with the Information Commissioner's Officer (ICO). Our registration number is Z1082474. Further details of how we handle data and the relevant complaints process with regards to data protection is outlined in our [Data Protection and Confidentiality Policy](#)¹.

2. How we collect your data

We may collect your personal data in a number of ways, for example:

- from the information you provide to us when you interact with us before joining, for example when you express your initial interest in studying at Bloomsbury Institute
- when you apply to study at Bloomsbury Institute and complete application forms via our website and/or through UCAS, and when you complete other admissions and visa compliance processes and procedures
- when you communicate with us by telephone, email, social media or via our website, for example in order to make enquiries or raise concerns
- as you interact with us during your time as a student, for the various purposes set out below
- from your answers to any online and paper survey forms and questionnaires we ask you to complete
- from third parties, for example from your previous or current school, sixth form college, university, agent, Student Funding Companies or employers who may provide a reference about you or who may sponsor your studies

3. Categories of data we collect

We may collect the following types of personal data and sensitive personal data about you. Personal data includes, but is not limited to, the following:

¹ <https://www.bil.ac.uk/qem/policies/>

- Personal contact details such as name, title, home and term time address, telephone numbers, and personal email addresses
- Date of birth
- Gender
- Marital status and dependants
- Next of kin and emergency contact information
- A record of the details you provided on your application form, any supporting documents requested as part of your admission and additional details provided by any referees and recorded following any interview and/or assessment process
- Where relevant, a copy of your passport, visa and other right to study documentation or information (note: this includes information relating to your UK immigration history, which we may also obtain from the UK Visas and Immigration (UKVI), as well your immigration history for any other country (if relevant))
- CCTV footage and other information obtained through electronic means such as student (swipe) card records when you are on campus
- Information for the purposes of assessing eligibility for bursaries, hardship/support funds and grants
- Financial information related to tuition fees and other financial charges such as course fees, scholarships (if applicable), payments made, outstanding debt, living costs and source of funds (if relevant)
- Records about your use of the academic and non-academic facilities and services that we offer including details of your engagement with your programme
- Information about your assessments and results
- breaches of our policies, if relevant, such as academic or other misconduct

Sensitive data we may collect is:

- Information relating to a disability, mental or physical illness or specific learning difficulty
- information about your racial or ethnic origin; religion or similar beliefs
- information about your sexual orientation

We will only process special category personal information in certain situations in accordance with the law.

4. How we use your data

Data collected will be held securely in your electronic student file and/or hardcopy file, where relevant, and access is controlled. Only staff who have an operational requirement to access this information will be able to do so. The purposes for which Bloomsbury Institute, and where relevant, the University of Northampton or Wrexham University, use your data include:

- To process your application, which may include, for example, seeking confirmation from other institutions and other relevant bodies of any information that you have declared on your application form;

- To enrol you as a student and maintain your student record;
- To communicate effectively with you by post, email, and phone including the distribution of relevant information considered necessary to support your student experience. Where appropriate you will be given the opportunity to opt-out of receiving some communications from us;
- To monitor the attendance of students in accordance with our Engagement Policy and, where relevant, for UKVI Student Route Visa compliance;
- To deliver and administer your education, record the details of your studies, and determine/confirm your academic achievements (e.g. results);
- To process survey results, for the surveys where it is not explicitly stated that the results are anonymous, to improve the quality of our services, performance, and teaching. Please note if you do not wish to have any of your data or information processed, you are free to opt out of completing any surveys;
- To obtain your UK immigration records from the UKVI (if relevant) necessary for the performance of tasks we carry out in the public interest (e.g. teaching and research);
- To administer the financial aspects of your relationship with us and any funders, including international funders, and managing the granting of scholarships, bursaries and other discretionary payments;
- To provide or offer facilities and services to you during your time as a student and thereafter as part of Bloomsbury Institute's legitimate business, including pastoral care;
- To operate security (including CCTV), governance, audit and quality assurance processes and arrangements;
- To compile statistics and conduct research for internal and statutory reporting purposes, for business improvement, and to support changes to service delivery;
- To submit reports and statistics to government organisations and/or third parties, which is necessary to fulfil our statutory and legal obligations;
- To enable your participation at events, including graduation ceremonies;
- To monitor equal opportunities;
- To ensure the safeguarding and welfare of students;
- To offer alumni services.

In other instances, for example, if you are an international student, we may from time to time disclose relevant parts of your personal information to organisations outside the UK, for example where legislation requires us to make a disclosure. Before we release your personal information to a country outside the UK, we will ensure that such country has in place adequate legal protection for the privacy of your personal information. If a country does not have in place adequate legal protection for the privacy of your personal information, we will put in place appropriate safeguards to cover this e.g., contractual clauses.

If you are an international student holding a student visa, we will maintain records of any visa refusal notices, enrolment and early course completion records and will notify the UKVI, as required, of the same, including ongoing engagement.

N.B. Under UK GDPR an organisation can process data, either on a lawful basis or by seeking consent from the data subject. Any data Bloomsbury Institute collects is on a legal basis and other sets are for processing for specific purposes, in order to be able to provide you with the service you expect at the

same time as complying with UK laws and regulations. Therefore, if you were to object, we would not be able to enrol you as a student.

5. Sharing of your data

The information shared and the manner of disclosure will be in accordance with the provisions of the Data Protection Act 2018 and UK GDPR. More details on how we handle data are covered in our [Data Protection and Confidentiality Policy](#)².

We may share your data with:

- the Bloomsbury Institute Student Guild (an independent body that represents the voice of our student population), in order for you to become a member of the Guild and take part in all the services they provide [you have the right to opt-out of becoming a member of the Guild].
- relevant internal or external auditors for checking the integrity of our data and processes sharing data with our partners, agents, other agencies and public bodies, including our technology suppliers for example our hosting service provider.
- Enrolly, or any other third party that we may use for the processing of applications.
- relevant bodies for surveying purposes. These include but are not limited to:
 - the Higher Education Statistics Agency (HESA) (see Section 6 below for more information)
 - National Student Survey (NSS)
 - Graduate Outcomes Survey
 - Universities and Colleges Admissions Service (UCAS) in order to maintain the integrity of UCAS Undergraduate data and for compliance with the UCAS Undergraduate Application and Recruitment Policy. This would only be relevant to undergraduate students who did not apply via UCAS.
 - Office for Students (OfS)
 - Home Office, UKVI. Relevant international students' records will be maintained throughout a student's period of study and 1 year after completion. UKVI will be notified of any breaches of, or non-compliance with, the UKVI regulations.
 - The Specialist Evidence, Evaluation and Research (SEER) service to support our evaluation and research commitments as part of our Access and Participation Plan.
- Where relevant, your Student Funding Company, to ensure compliance with any loan agreement.

Except for sharing your data with the third parties mentioned above, we will never share any of your data with any other third parties where it is not necessary to do so, or without asking for your explicit consent prior to the distribution of the information. Furthermore, we will never sell your data to any related and/or third parties.

In some circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do this, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. If you do consent, you can withdraw your consent at any time. Where you provide sensitive information,

² <https://www.bil.ac.uk/qem/policies/>

such as details about a disability, mental or physical illness or specific learning difficulty at enrolment, or at another time in order to receive an additional service from us, such as services provided by our Disability and Wellbeing team, you will be given further details about the use of this data.

6. Data submission to the Higher Education Statistics Agency (HESA)

In order to fulfil the obligations, set by the Office for Students, and to comply with specific course designation criteria, we are required to provide personal data about you to HESA. This is a legal requirement and we will therefore not seek your permission to disclose data about you to HESA.

HESA publishes a Student Collection Notice. We comply fully with this Student Collection Notice. The Notice is regularly reviewed. The most up-to-date version is available at:

<https://www.hesa.ac.uk/about/regulation/data-protection/notices>

Minor updates to the HESA Student Collection Notice may be made at any time. Major updates will be made no more than once per year. It is your responsibility to keep up to date with the updates.

If you would like a copy of the Student Collection Notice, please contact our Data Protection Officer at:

dpo@bil.ac.uk

7. How we keep your data secure

Bloomsbury Institute has internal policies, which include our Data Protection and Confidentiality Policy, and our document retention schedule within our Records Management Policy, that explain how we keep your data secure. Controls are in place to prevent unauthorised access or disclosure, any changes to or destruction of data, and to ensure that data is not misused and is not accessed except by relevant staff in the performance of their duties. The third parties we share your information with are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Relevant policies can be found [here](#)³

8. Engagement monitoring

Students enrolling on a course at Bloomsbury Institute must agree to have their attendance and engagement monitored, and for the data to be used for intervention and reporting purposes (including reporting to external agencies). We monitor a student's attendance and engagement because we have a duty of care as a responsible institution to follow up promptly on matters of non-attendance and non-engagement so that students can be supported and given every opportunity to succeed. In addition, we are obliged to comply with the requirements of the UKVI, the Student Funding Companies and other external agencies which require the monitoring and reporting of student attendance and engagement. Attendance and engagement involve not only attendance at timetabled classes, but also, *inter alia*, responding to our interventions, accessing our Virtual Learning Environment (Canvas) and eBooks, submitting assignments, and sitting examinations.

More information can be found in our Engagement Policy which can be accessed by following the link in section 7 above.

9. How long we keep your information

We will only retain your personal data for as long as it is needed for the purposes set out in this document, or for as long as the law requires us to. Subject to any other notices that we may provide to

³ <https://www.bil.ac.uk/qem/policies/>

you, we may retain your personal data for a period of six years after you have completed your course with us. However, some information may be retained indefinitely by us in order to maintain your academic record and respond to any enquiries. The information that may be kept indefinitely includes:

- Your name
- Date of birth
- Your student ID
- Your grades and achievement during your studies with us
- Your financial history with us
- Your immigration history (where relevant)

For more information, please see our [Records Management Policy](#)⁴.

10. Your rights

Under the UK GDPR, you have the following rights:

- The right to be informed
- The right to subject access
- The right to rectification
- The right to object
- The right to erasure
- The right to portability
- The right to restrict processing
- The right to automated decision-making and profiling

A detailed explanation of your rights can be found in our Data Protection and Confidentiality Policy through the link in Section 7 above.

N.B. Whilst this Privacy Notice sets out many of the ways in which we collect and use students' data, it does not provide an exhaustive list of all the ways in which we collect and use personal data and this is regularly reviewed. Please also note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you have given your consent and you wish to withdraw it, please contact our Data Protection Officer using the contact details set out below in Section 11. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

11. Further information

If you have any queries about this Privacy Notice or how we process your personal data or to request access to the personal data we hold about you, you can contact our Data Protection Officer by email, telephone or by post:

⁴ <https://www.bil.ac.uk/qem/policies/>

Email: dpo@bil.ac.uk

Telephone: +44 (0) 20 7078 8840

Post: Data Protection Officer, Bloomsbury Institute, 7 Bedford Square, London
WC1B 3RA.